

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No.

AGERE SYSTEMS, INC.;
ALCOLAC, INC.;
AKZO NOBEL COATINGS, INC.;
A.L.P. LIGHTING & CEILING
COMPANY, INC.;
AMERICAN CHEMICAL & REFINING
COMPANY, INC.;
AUTO CRAFT BODY & PAINT
COMPANY, INC.
(Calvert County, Maryland);
BOULDEN, INC.;
BAYER CROPSCIENCE INC.;
BERLUK, INC.,
f/k/a J.W. Fergusson & Sons, Inc.;
BRENNTAG NORTHEAST, INC.;
BRENNTAG SOUTHEAST, INC.,
f/k/a Southchem, Inc.;
BRIDGESTONE FIRESTONE NORTH
AMERICAN TIRE, LLC;
BRISTOL-MYERS SQUIBB COMPANY;
CARRIER CORPORATION;
CASCHEM, INC.,
d/b/a Heico Chemicals, Inc.;
CFC INTERNATIONAL, INC.;

COMPLAINT

CHARLES COUNTY AUTO BODY
COMPANY, INC. (**Charles County,**
Maryland);
CHEMICAL WASTE MANAGEMENT, INC.;
CHESAPEAKE CADILLAC/JAGUAR
COMPANY, INC. (**Baltimore County,**
Maryland);
CIBA SPECIALTY CHEMICALS
CORPORATION;
CLARIANT CORPORATION;
CLEAN HARBORS ENVIRONMENTAL
SERVICES, INC.;
COGNIS CORPORATION;
CONCORD AUTO BODY INC.;
CONGOLEUM CORPORATION;
CONOCOPHILLIPS COMPANY;
CYTEC INDUSTRIES, INC.;
DAIMLERCHRYSLER CORPORATION;
DAMON COMPANY OF SALEM, INC.;
DeSIMONE CADILLAC CO.;
DIXON TICONDEROGA COMPANY, INC.;
DOPACO, INC.;
DOYLESTOWN AUTO CENTER;
DRI-PRINT FOILS, INC.;
E.I. DUPONT DE NEMOURS AND COMPANY;
FARBOIL COMPANY;
FAULKNER PONTIAC-GMC, INC.;
FERMTEC, INC.,
f/k/a Fermenta Holding Company, Inc.;
FINNELL'S AUTO BODY COMPANY, INC.;

FIRESTONE PLASTICS COMPANY;
FRY'S METALS, INC. d/b/a Alpha Metals, Inc.;
GENERAL MOTORS CORPORATION;
GLENN SPRING HOLDINGS, INC.;
GST AUTO LEATHER, INC.,
f/k/a Garden State Tanning, Inc.;
GUARDIAN ENVIRONMENTAL SERVICES,
INC.;
HEMPEL (USA) INC.;
HENKEL CORPORATION;
HERCULES INCORPORATED;
HEXION SPECIALTY CHEMICALS, INC.,
f/k/a Borden, Inc.;
HONEYWELL INTERNATIONAL, INC.;
IBM CORPORATION;
INDOPCO, INC.;
INTERNATIONAL RESISTIVE COMPANY, INC;
ISP ENVIRONMENTAL SERVICES, INC.;
KENYON INDUSTRIES, INC.;
KERBECK MITSUBISHI CADILLAC PONTIAC
COMPANY, INC.;
KIRKER ENTERPRISES, INC.;
LA FRANCE CORPORATION;
LILLY INDUSTRIES, INC.;
M.A. BRUDER & SONS, INC.;
MANNINGTON MILLS, INC.;
MARISOL, INC.;
MARYLAND SPECIALTY WIRE, INC.;
MAX INTERNATIONAL CONVERTERS, INC.,
MERCK & CO., INC.;
METLON CORPORATION;
MOORE CADILLAC COMPANY, INC.;
MORGAN STANLEY SERVICES COMPANY,
INC., f/k/a Levolor Lorentzen Corporation;

MORTON INTERNATIONAL, INC.;
NEPERA, INC.;
NOVARTIS CORPORATION;
OLIVER TYRONE PULVER CORPORATION;
OSRAM SYLVANIA, INC.;
PENN COLOR, INC.;
PERMA-FIX OF MICHIGAN, INC.,
f/k/a Chem-Met Services;
PHARMACIA CORPORATION;
POLYONE CORPORATION,
POWERCON CORPORATION
(Ann Arundel County, Maryland);
PPG INDUSTRIES, INC.;
PRODUCTS SUPPORT, INC.
(Ann Arundel County, Maryland);
RELIABLE MANUFACTURING COMPANY,
INC.;
RESOURCE RECOVERY MIDSOUTH, INC.;
ROTHROCK MOTOR SALES, INC.;
RUFÉ CHEVROLET, INC.;
RUHE MOTOR CORPORATION;
SCHERING CORPORATION;
SCOTT PAINT COMPANY, INC.;
SIMON WRECKING COMPANY, INC.;
SMITH KLINE BEECHAM CORPORATION,
d/b/a GlaxoSmith Kline;
SOLVENTS & PETROLEUM SERVICE, INC.;
SPX CORPORATION,
f/k/a General Signal;
SULLIVAN PAPER COMPANY, INC.;
TEVA PHARMACEUTICALS USA, INC.;
THE VALSPAR CORPORATION;
UNION CARBIDE CORPORATION;
WACO, INC.;
WILMINGTON COIL CORPORATION;

W.L. GORE & ASSOCIATES, INC.
(Cecil County, Maryland);
WYETH;
WYETH HOLDINGS CORPORATION;
WYETH PHARMACEUTICALS, INC.;
YORK LABEL HOLDINGS, INC.,

Defendants.

(See Attachment 1 for Addresses of Defendants.)

COMPLAINT

The United States of America, by authority of the Attorney General of the United States and through the undersigned attorneys, acting at the request of the Administrator of the United States Environmental Protection Agency ("U.S. EPA"), files this complaint and alleges as follows:

STATEMENT OF THE CASE

1. This is a civil action for the recovery of costs brought pursuant to Section 107 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. § 9607, as amended by the Superfund Amendments and Reauthorization Act of 1986, 100 Stat. 1613 (1986) ("CERCLA"). The United States seeks to recover costs it has incurred in connection with the facility known as the Spectron, Inc. Superfund Site ("Site") located near Elkton, Maryland. In addition, the United States seeks a judgment,

pursuant to CERCLA Section 113(g)(2), 42 U.S.C. § 9613(g)(2), declaring that each Defendant is liable for any further response costs that the United States may incur as a result of releases or threatened releases of hazardous substances from the Site.

JURISDICTION AND VENUE

2. This Court has jurisdiction over the subject matter of this action and the parties hereto, pursuant to CERCLA Section 113(b), 42 U.S.C. § 9613(b), and 28 U.S.C. §§ 1331 and 1345.

3. Venue is proper in this district pursuant to CERCLA Section 113(b), 42 U.S.C. § 9613(b), and 28 U.S.C. § 1391(b) and (c), because the claims arose and the threatened and actual releases of hazardous substances occurred in this district.

DEFENDANTS

4. Each Defendant is a "person" within the meaning of CERCLA Section 101(21), 42 U.S.C. § 9601(21).

5. Each Defendant: (1) conducted business in the State of Maryland and/or by contract, agreement or otherwise, arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by each such Defendant at the Site, within the meaning of CERCLA Section 107(a)(3), 42 U.S.C. § 9607(a)(3); (2) is a

successor-in-interest to a person that conducted business in the State of Maryland and/or by contract, agreement or otherwise, arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such person at the Site, within the meaning of CERCLA Section 107(a)(3), 42 U.S.C. § 9607(a)(3); or (3) otherwise acquired liability for a person that conducted business in the State of Maryland and/or by contract, agreement or otherwise, arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such person at the Site within the meaning of CERCLA Section 107(a)(3), 42 U.S.C. § 9607(a)(3).

GENERAL ALLEGATIONS

6. The Site consists of approximately eight (8) acres located just outside Elkton, Maryland. From approximately 1961 to 1988 the site operated as a solvent recycling facility. The facility reclaimed, reprocessed and recycled industrial wastes consisting primarily of halogenated organic solvents, such as methylene chloride, tetrachloroethylene, and trichloroethylene, and volatile organic aromatics, such as benzene, toluene, and xylene. At least one lagoon at the Site was used to dispose of process wastes generated at the facility.

7. When recycling operations ceased in August 1988, many hazardous

substances that had been received, processed, generated and used in its operations were abandoned at the Site. Contamination at the Site consists of primarily chlorinated solvents which have been detected in: groundwater seeps entering Little Elk Creek, which bisects the Site; surface water and sediments of Little Elk Creek; groundwater beneath and down-gradient of the Site; and soil on the Site. Other contaminants found in shallow groundwater monitoring wells at the Site include: volatile organic compounds, semi-volatile organic compounds and some heavy metals.

8. Little Elk Creek is designated by the state for water contact recreation, protection of aquatic life and wildlife, and fishing. Several residents residing immediately adjacent to the Site and others living nearby use private wells for drinking water. Site-related contaminants have been detected in some of these wells.

9. In April 1989, EPA conducted an emergency assessment of the conditions at the Site. EPA observed approximately 1,300 drums and 62 tanks containing hazardous Substances on-site.

10. In June 1989, the EPA Region III Regional Administrator approved the expenditure of funds pursuant to Section 104 of CERCLA, 42 U.S.C. § 9604, to address the releases and threat of releases of hazardous substances at the Site.

EPA's actions included over-packing drums, decanting leaking drums, collecting samples and establishing 24-hour security.

11. On August 21, 1989, EPA entered into an Administrative Order by Consent (Docket No. III-89-23-DC), pursuant to Section 106 of CERCLA, 42 U.S.C. § 9606, with a group of potentially responsible parties (PRPs). This Order required the continuation of emergency response actions for the removal and disposal of the abandoned material identified at the Site, particularly the over-packed drums and tanks at the Site.

12. EPA concurrently entered a second Administrative Order by Consent (Docket No. III-89-29-DC) with PRPs for reimbursement of response costs in the amount of \$674,139.66.

13. On February 1, 1990, EPA issued a Unilateral Administrative Order (Docket No. III-91-11-DC) for access, pursuant to CERCLA Sections 104(e) and 106(a), 42 U.S.C. §§ 9604(e) and 9606(a), to Paul J. Mraz and Sally K. Mraz, owners of the Site.

14. On October 1, 1991, EPA entered into a subsequent Administrative Order by Consent (Docket No. III-91-40-DC) with a group of PRPs to develop a plan to abate, mitigate, and/or eliminate the seepage of hazardous substances into Little Elk Creek.

15. On May 20, 1996 EPA entered into an Administrative Order on Consent for Remedial Investigation/Feasibility Study ("RI/FS") (Docket No. III-96-15-DC), pursuant to CERCLA Sections 104 and 122, 42 U.S.C. §§ 9604 and 9622, with certain PRPs. The RI/FS for Operable Unit 1, for contaminated soils and overburden groundwater, was approved by EPA in March 2003. The RI for OU2 is ongoing and is expected to determine the nature and extent of contamination in the bedrock aquifer at the Site.

16. In 2001, EPA offered the First Round De Minimis Settlement to approximately 900 de minimis-eligible PRPs. Four hundred and ninety-four of those de minimis PRPs took this opportunity to settle their liability at the Site. The settlement was entered by this Court in 2003. United States v. ABB, Inc., Civil No. AMD 02-3858.

17. In 2005, EPA offered a Second Round De Minimis Settlement to parties who did not have an opportunity to join the first round settlement. Forty-eight de minimis PRPs took this opportunity to settle their liability at the Site. The settlement was entered by this Court in 2006. United States v. Air Products and Chemicals, Civil No. 1:06-CV-00038.

18. There have been "releases," within the meaning of CERCLA Section 101(22), 42 U.S.C. § 9601(22), or the threat of "releases" of hazardous substances

into the environment from the Site at times relevant to this action.

19. The Site is a facility within the meaning of CERCLA Section 101(9), 42 U.S.C. § 9601(9).

20. Hazardous substances, within the meaning of CERCLA Section 101(14), 42 U.S.C. § 9601(14), have been disposed of at the Site.

21. The decision by EPA on the remedial action to be implemented for OU1 at the Site is embodied in a final Record of Decision ("ROD"), executed on September 16, 2004. The ROD includes EPA's explanation for any significant differences between the final plan and the proposed plan as well as a responsiveness summary to the public comments. Notice of the final plan was published in accordance with Section 117(b) of CERCLA. The Remedial Design for OU1 ("RD") has been completed by Defendant and the Remedial Action for OU1 is currently being implemented by Defendant pursuant to a Unilateral Administrative Order issued by EPA.

22. The selected remedy is consistent with CERCLA and the National Contingency Plan, 40 C.F.R. Part 300.

23. An RI/FS for Operable Unit 2 ("OU2"), which relates to the bedrock ground water at the Site, currently is being performed by some PRPs. EPA intends

to issue a ROD for OU2 ("OU2 ROD") following completion of the RI/FS for OU2.

FIRST CLAIM FOR RELIEF

Injunctive Relief

24. Paragraphs 1 through 23 are incorporated herein by reference.

25. Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), provides in pertinent part:

In addition to any other action taken by a State or local government, when the President determines that there may be an imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance from a facility, he may require the Attorney General of the United States to secure such relief as may be necessary to abate such danger or threat, and the district court of the United States in the district in which the threat occurs shall have jurisdiction to grant such relief as the public interest and the equities of the case may require.

26. By Executive Order 12580 dated January 23, 1987, the President's functions under Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), have been delegated to the Administrator of EPA.

27. EPA has determined that there is or may be an imminent and substantial endangerment to the public health or welfare or the environment because of actual or threatened releases of hazardous substances from OU1.

28. Defendants are liable for the injunctive relief to which the United States is entitled at the Site under Section 106(a) of CERCLA, 42 U.S.C.

§ 9606(a), including, but not limited to, such relief as may be necessary to abate the imminent and substantial endangerment to the public health or welfare or the environment caused by the release or threatened release of hazardous substances from OU1.

SECOND CLAIM FROM RELIEF

Cost Recovery

29. Paragraphs 1-23 are realleged and incorporated herein by reference.

30. CERCLA Section 107(a)(3), 42 U.S.C. § 9607(a)(3), provides in pertinent part:

Notwithstanding any other provision or rule of law, and subject only to the defenses set forth in subsection (b) of this section-

* * * *

(3) any person who by contract, agreement, or otherwise arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such person, by any other party or entity at any facility . . . owned or operated by another party or entity and containing such hazardous substances . . . from which there is a release, or a threatened release which causes the incurrence of response costs, of a hazardous substance, shall be liable for--

(A) all costs of removal or remedial action incurred by the United States Government or a State or an Indian tribe not inconsistent with the national contingency plan[.]

31. The actions taken by the United States in connection with the Site constitute "response" actions within the meaning of CERCLA Section 101(25), 42 U.S.C. § 9601(25), in connection with which the United States has incurred costs.

32. The costs incurred by the United States in connection with the Site are not inconsistent with the National Contingency Plan, which was promulgated under CERCLA Section 105(a), 42 U.S.C. § 9605(a), and codified at 40 C.F.R. Part 300, et seq.

33. As a result of the releases or threatened releases of hazardous substances from the Site, the United States has incurred and will continue to incur response costs, including the costs of removal or remedial action as defined in Sections 101(23), (24) and (25) of CERCLA, 42 U.S.C. § 9601(23), (24) and (25), and as used in Section 107(a) of CERCLA, 42 U.S.C. § 9607(a).

34. The United States continues to incur response costs in connection with the Site. As of November 25, 2003, U.S. EPA had incurred unreimbursed response costs in connection with the Site of approximately \$3,201,532.77.

35. Pursuant to CERCLA Section 107(a), 42 U.S.C. § 9607(a), Defendants are jointly and severally liable, with other liable parties, to the United States for all response costs incurred and to be incurred by the United States in connection with the Site, including enforcement costs and prejudgment interest on such costs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, United States of America, respectfully requests

that the Court:

1. Order Defendants, jointly and severally, to take all actions necessary to remedy the conditions at OU1 that may present an imminent and substantial endangerment to the public health, welfare or the environment;
2. Award the United States a judgment against the Defendants, jointly and severally, for all costs incurred by the United States in connection with the Site, including all enforcement costs and all costs in this action;
3. Award the United States a declaratory judgment that the Defendants will be jointly and severally liable, with other liable parties, for any further response costs that the United States may incur as a result of releases or threatened releases of hazardous substances from the Site; and
4. Grant any further relief the Court deems appropriate.

Respectfully submitted,

UNITED STATES DEPARTMENT OF JUSTICE

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Environment and Natural Resources Division

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Environmental Enforcement Section
U.S. Department of Justice
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District of Maryland

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Baltimore, MD 21201

Of Counsel:
HUMANE ZIA
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

ATTACHMENT 1
ADDRESSES OF DEFENDANTS
United States v. Acme Backing Corporation

Agere Systems, Inc.
1110 American Parkway, NE, 12J-306
Allentown, PA 18109

Alcolac, Inc.
Rhodia Inc.
8 Cedar Brook Dr.
Cranbury, NJ 08512

Akzo Nobel Coatings Inc.
2031 Nelson Miller Parkway
Louisville, KY 40223

A.L.P. Lighting & Ceiling Company, Inc.
6333 Gross Point Road
Niles, IL 60714

American Chemical & Ref. Company, Inc.
828 Veterans Memorial Parkway
East Providence, R.I. 02914

Auto Craft Body & Paint Company, Inc.
619 Burnside Place
Alexandria, Va 22304

Bayer CropScience Inc.
2 TW Alexander Drive
PO Box 12014
Research Triangle Park, NC 27709

Berluk, Inc.
400 Woodlawn Avenue
Richmond, VA 23221

Boulden, Inc.
540 Old Barksdale Road
Newark, DE 19711

Brenntag Northeast, Inc.
81 West Huller Lane
Reading, PA 19605

Brenntag Southeast, Inc.
225 Hillsborough Street
Raleigh, NC 27603

Bridgestone Firestone North
American Tire, LLC
535 Marriott Drive
Nashville, TN 37214

Bristol-Myers Squibb Company
P.O. Box 4755
Syracuse, NY 13057

Carrier Corporation
United Technologies Corporation
One Financial Plaza
M/S 524
Hartford, CT

Cary Chemical Company, Inc.
Polyone Corporation
33587 Waller Road
Avon Lake, Ohio 44012

CasChem, Inc.
Heico Chemicals, Inc.
One Meadowlands Plaza
East Rutherford, NJ 07073

CFC International
500 State Street
Chicago Heights, IL 60430

Charles County Auto Body
Company, Inc.
4750 Indian Head Highway
Indian Head, MD 20640

Chemical Waste Management, Inc.
4 Liberty Lane West
Hampton, NH 03842

Chesapeake Cadillac/Jaguar Company, Inc.
10240 York Rd.
Cockeysville, MD 21030

Ciba Speciality Chemicals Corporation
540 White Plains Road
Tarrytown, NY 10591

Clariant Corporation
4000 Monroe Road
Charlotte, NC 28205

Clean Harbors Environmental Services, Inc.
42 Longwater Drive
Norwall, MA 02061-9149

Cognis Corporation
5051 Estecreek Drive
Cincinnati, OH 45232

Concord Auto Body, Inc.
1719 Wilmington Pike
PO Box 454
Concordville, PA 19331

Congoleum Corporation
3500 Quakerbridge Rd.
Mercerville, NJ 08619

ConocoPhillips Company
600 N. Dairy Ashford (TN 5022)
Houston, TX 77079

Cytec Industries, Inc.
c/o Wyeth
5 Giralda Farms
Madison, NJ 07940

DaimlerChrysler Corporation
800 Chrysler Drive
CIMS 482-00-51
Auburn Hills, MI 48326

Damon Company of Salem, Inc.
2117 Salem Industrial Drive
Salem, VA 24153

DeSimone Cadillac Co.
6 Estherbrook Lane
Cherry Hill, New Jersey 08003

Dixon Ticonderoga Company, Inc.
195 International Parkway
Heathrow, FL 32746

Dopaco, Inc.
100 Arrandale Blvd.
Exton, PA 19341

Doyleston Auto Center
Company, Inc.
1729 Triumphe Way
Warrington, PA 18976

Dri-Print Foils, Inc.
329 New Brunswick Aenue
Rahway, NJ 07065

E.I. duPont de Nemours and Company
1007 Market Street
Wilmington, DE 19898

Fermtec, Inc.
c/o Patton Boggs LLP
2550 M Street, NW
Washington, DC 20037

Finnell's Auto Body Company, Inc.
3017 Rt 413
Bristol, PA 19007

Fry's Metals, Inc.
Alpha Metals, Inc.
Cookson America, Inc.
One Cookson Place
Providence, RI 02903

General Motors Corporation
300 Renaissance Center
PO Box 300
Detroit, MI 48265-3000

Glenn Springs Holdings, Inc.
2480 Fortune Drive, Suite 300
Lexington, KY 40509

GST AutoLeather, Inc.
Raritan Plaza 1
Raritan Center, 2nd Floor
Edison, NJ 08818

Guardian Environmental
Services, Inc.
1280 Porter Road
Bear, DE 19701

Hempel (USA), Inc.
600 Conroe Park North
Conroe, Texas 77303

Henkel Corporation
Henkel of America, Inc.
2200 Renaissance Blvd., Suite 200
Gulph Mills, PA 19406

Hercules Incorporated
500 Hercules Road
Wilmington, DE 19808

Hexion Speciality Chemicals, Inc.
180 E. Broad Street
Columbus, OH 43215

Honeywell International Inc.
101 Columbia Road
Morristown, NJ 07962

IBM Corporation
294 Route 100
Somers, NY 10589

Indopco, Inc.
National Starch and Chemical Company
10 Finderne Avenue
Bridgewater, NJ 08807

International Resistive Company, Inc.
4222 South Staples
Corpus Christi, TX 78411

ISP Environmental Services Inc.
c/o Arnold & Porter LLP
399 Park Avenue
New York, NY 10022

Kenyon Industries, Inc.
36 Sherman Avenue
Kenyon, RI 02836

Kerbeck Mitsubishi/Cadillac Pontiac
Company, Inc.
430 N. Albany Avenue
Atlantic City, NJ 08401

Kirker Enterprises, Inc.
225 Millburn Avenue, Suite 202
Millburn, NJ 07041

La France Corporation
P.O. Box 5002
Concordville, PA 19331

M.A. Bruder & Sons, Inc.
600 Reed Road
Broomall, PA 19008

Mannington Mills, Inc.
P.O. Box 30
Salem, NJ 08079

Marisol, Inc.
213 W. Union Ave.
Bound Brook, NJ 08805

Maryland Speciality Wire, Inc.
555 Theodore Fremd. Ave.
Rye, New York 10580

MAX International Converters, Inc.
2360 Dairy Road
Lancaster, PA 17601

Merck & Co., Inc.
2 Merck Drive
WS3W16D
Whitehouse Station, NJ 08889

Moore Cadillac Company, Inc.
8595 Leesburg Pike
Vienna, VA 22182

Morgan Stanley Services Company, Inc.
40 Morgan Stanley
195 Broadway- 18th Floor
New York, NY 10007

Morton International, Inc.
100 Independence Mall West
Philadelphia, PA 19106

Nepera, Inc.
c/o Cambrex Corporation
One Meadowlands Plaza
East Rutherford, NJ 07073

Oliver Tyrone Pulver Corporation
300 Barr Harbor Drive, Suite 750
West Conshohocken, PA 19428

Osram Sylvania, Inc.
100 Endicott St.
Danvers, MA 01923

Penn Color, Inc.
400 Old Dublin Pike
Doylestown, PA 18901

Perma-Fix of Michigan, Inc.
8302 Dunwoody Place, Suite 250
Atlanta, GA 30350

Pharmacia Corporation
Monsanto Company
800 N. Lindbergh Blvd., B3SA
St. Louis, MO 63167

Poly One Corporation
33587 Walker Road
Avon Lake, Ohio 44012

Powercon Corporation
1551 Florida Avenue
Severn, MD 21144

PPG Industries, Inc.
440 College Park Drive
Monroeville, PA 15146

Products Support Inc.
8331 Bristol Court
Jessup, Md 20794

Reliable Manufacturing
Company, Inc.
125 Highland Park Drive
Bloomfield, CT 06002

Resource Recovery Midsouth, Inc.
World Fuel Services Corporation
9800 NW 41st Street, Suite 400
Miami, FL 33178

Rothrock Motor Sales, Inc.
Route 22 & 15th Street
Allentown, PA 18104

Rufe Chevrolet Inc.
1601 Ritner Hwy.
Carlisle, PA 17013

Ruhe Motor Corporation
1501 W. Tilghman Street
Allentown, PA 18102

Schering Corporation
1095 Morris Avenue-U-23
Union, New Jersey 07083-7143

Scott Paint Company, Inc.
7839 Fruitville Road
Sarasota, FL 34240

Simon Wrecking Company, Inc.
P.O. Box 3275
Williamsport, PA 17701

Smith Kline & Beecham Corporation
GlaxoSmithKline
One Franklin Plaza
200 N. 16th St
Philadelphia, PA 14102

Solvents & Petroleum Service, Inc.
1405 Brewerton Road
Syracuse, New York 13208

SPX Corporation
13515 Ballantyne Corporate Place
Charlotte, NC 28277

Sullivan Paper Company, Inc.
c/o Sullivan Paper Co., Inc.
P.O. Box 88
West Springfield, MA 01090-0088

Teva Pharmaceuticals USA, Inc.
425 Privet Road
Horsham, PA 19044

The Valspar Corporation
1101 South 3rd Street
Minneapolis, MN 55415

Union Carbide Corporation
Dow Chemical Company
2030 Dow Center
Midland, MI 48674

Waco, Inc.
5450 Lewis Road
Sandston, VA 23150

Wilmington Coil Corporation
824 Market Street, Suite 900
Wilmington, DE 19801

W.L. Gore & Associates, Inc.
Elk Mills I
501 Viere's Way
Elkton, MD 21921

Wyeth
5 Giralda Farms
Madison, NJ 07940

Wyeth Holdings Corporation
5 Giralda Farms
Madison, NJ 07940

Wyeth Pharmaceuticals, Inc.
5 Giralda Farms
Madison, NJ 07940

York Label Holdings, Inc.
405 Willow Springs Lane
York, PA 17402